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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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12 In Re 17 U.S.C. § 512(h) Subpoena to
13 CLOUDFLARE, INC.

Case Number: 2:23-mc-00185

**DECLARATION OF JAN VAN
VOORN IN SUPPORT OF
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

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20 I, Jan van Voorn, the undersigned, declare that:

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22 1. I am Executive Vice President and Chief of Global Content Protection
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on
24 behalf of Paramount Pictures Corp., Universal Network Television, LLC, and
25 Warner Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of
26 the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of
27 leading content creators and on-demand entertainment services committed to
28 supporting the legal marketplace for video content and addressing the challenge of

1 online piracy. The ACE Members, whether themselves or through subsidiaries and
2 affiliates, own the copyrights in the below referenced copyrighted works.

3 2. The ACE Members (via the Motion Picture Association, Inc.) are
4 requesting issuance of the attached proposed subpoena that would order Cloudflare,
5 Inc. to disclose the identities, including names, physical addresses, IP addresses,
6 telephone numbers, e-mail addresses, payment information, account updates and
7 account histories of the users operating the following websites:


No	Domain	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	futemax.l a	It Chapter Two	sathoshinam oto.com/pla yer/mycdn? canal=hboh d&past a=live	Jack Reacher: Never Go Back	sathoshina moto.com/ player/myc dn?canal=t elecineacti onsd&pasta=myli ve
2	futemax.r e	Supernatur al S04E12	sinalpublico .com/player 3/chfut.php ?canal=war ner	Law & Order: Special Victims Unit S15E20	sinalpublic o.com/play er3/chfut.p hp?canal=u niversal
3	futemax.i nk	Justice League	reidoscanais .com/embed /?id=warner tv	Law & Order: Special Victims Unit S15E20	playertv.ne t/tv.php?c= universal
4	canales.o nline	The Big Bang Theory S02E14	canales.onli ne/embed/c v.html?get= V2FybmVy SEQ=	Chicago PD S03E06	canales.onl ine/embed/ cv.html?ge t=VW5pd mVyc2FsX 0NoYW5u ZWxfSEQ =

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25 3. The purpose for which this subpoena is sought is to obtain the identities
26 of the individuals assigned to these websites who have exploited ACE Members'
27 exclusive rights in their copyrighted motion pictures without their authorization.
28 This information will only be used for the purposes of protecting the rights granted

1 to ACE Members, the motion picture copyright owners, under Title II of the Digital
2 Millennium Copyright Act.

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4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct to the best of my knowledge,
6 information or belief.

7 Executed at Redondo Beach, California, on December 21, 2023.

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11 _____
12 Jan van Voorn
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